## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

MARIA MOE,

Plaintiff,

v.

Civil Action No. 1:25-cv-10195

DONALD TRUMP, in his official capacity as President of the United States; JAMES R. MCHENRY III, in his official capacity as Acting Attorney General of the United States; WILLIAM LOTHROP, in his official capacity as Acting Director of the Federal Bureau of Prisons,

Defendants.

## MOTION FOR ADMISSION PRO HAC VICE OF NATALIE J. KRANER

Pursuant to Local Rule 83.5.3 Of the Local Rules of Civil Procedure of the United States

District Court for the District of Massachusetts, I, Bennett Klein, a member of the bar of this

Court and counsel of record for Plaintiff Maria Moe, hereby move that Natalie J. Kraner be

granted leave to appear *pro hac vice* before this Court as counsel for Plaintiff in the abovecaptioned matter. In support thereof, Bennett Klein respectfully submits as follows:

- 1. I am an attorney in good standing with the Massachusetts Bar and have been licensed to practice law in the Commonwealth of Massachusetts since 1987;
- 2. Natalie J. Kraner is a member of the bar in good standing in the State of New York and has been a member of that bar since October, 2006;
- 3. Natalie J. Kraner, is a member in good standing of every jurisdiction where she has been admitted to practice law;
  - 4. Natalie J. Kraner, has no disciplinary proceedings pending against her;
  - 5. Natalie J. Kraner, has not previously had a pro hac vice admission (or other

limited purpose admission) to this Court revoked for misconduct;

6. Natalie J. Kraner has read and agrees to comply with the Local Rules of the

U.S. District Court for the District of Massachusetts.

WHEREFORE, this Court should admit Natalie J. Kraner pro hac vice to the bar of this

Court.

Dated: January 29, 2025

Respectfully submitted, /s/ Bennett Klein

Bennett Klein (Bar No. 550702)
Jennifer L. Levi (Bar No. 562298)
Sarah Austin (pro hac vice pending)
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Christopher F. Stoll (*pro hac vice* pending) Amy Whelan (*pro hac vice* pending) **National Center for Lesbian Rights** 870 Market Street, Suite 370 San Francisco, CA 94102 (415) 392-6257 cstoll@nclrights.org awhelan@nclrights.org

Alexander Shalom (*pro hac vice* pending) Natalie J. Kraner (*pro hac vice* pending) **Lowenstein Sandler LLP** 1251 Avenue of the Americas New York, NY 10020 (862) 926-2029 ashalom@lowenstein.com nkraner@lowenstein.com

## **CERTIFICATE OF SERIVCE**

I, Bennett Klein, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: January 29, 2025	/s/Bennett Klein	
	Bennett Klein	